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people of the state, the enjoyment of which may be limited to its citizens as against both aliens and the citizens of other states. Thus in *McCready v. Virginia*, 94 U. S. 391, 396, 24 L. Ed. 248, 249, the restriction to the citizens of Virginia of the right to plant oysters in one of its rivers was sustained upon the ground that the regulation related to the common property of the citizens of the state."

Right of Parties to Withdraw from Legal Action.—An interesting question involving the right of parties to withdraw from legal action has recently been reported from the Circuit Court of Appeals, Second Circuit. The opinion appears in the case of *The Titanic*—In re Oceanic Steam. Nav. Co., published in 225 Federal Reporter, 747.

The steamship company having brought proceedings for limitation of liability for claims resulting from the destruction of the ill-fated vessel, certain claimants asked leave to discontinue. The court says: "It is asserted that the object of the claimant is to get permission to prosecute her suit in England. This may be true, but whether true or not is, in our view, immaterial. The motion is that the claimant have permission to withdraw her claim in the District Court. We do not see that she is called upon to state her reason for this motion, but it is easy to infer that her reason, as well as that of the other claimants, is that she is satisfied that she can get no adequate redress in the courts of the United States. If she has the right, her reason for asserting her right is immaterial. The rule is, we think, practically universal that, where a suit at law is commenced for damages and the defendant interposes no counterclaim and seeks no affirmative relief, the plaintiff may discontinue the action at any time on payment of costs. * * *

"Conceding, for the argument's sake, that the court is justified in considering the future, is it conceivable that any court will compel him, in invitum, to remain in its jurisdiction because he thinks he can obtain more complete justice elsewhere? We think not. The only question for the District Court was, Have these parties a right, on paying costs, to withdraw their claims? * * * If they decide to bring new suits or proceedings it is for the court in which the claims are presented to pass upon their validity and upon any plea in abatement or in bar which may be interposed."

Self-Defense in the Home.—A father shot and killed his son, a young man of 22, and was convicted of murder. The shooting took place in the little cottage where the son had been born and reared. On the trial the father maintained that he had acted without premeditation, when blinded by passion because of blows and insults, and that